

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

HENRIETTA WILSON, ET AL

Plaintiffs

vs.

PRIME SOURCE HEALTHCARE OF OHIO,  
INC., ET AL

Defendants

CASE NO. 1:16-CV-01298-JG

JUDGE JAMES S. GWIN

MAGISTRATE JUDGE  
WILLIAM H. BAUGHMAN, JR.

**MOTION FOR ADMISSION *PRO*  
*HAC VICE* OF ATTORNEY M.  
CARTER CROW**

\* \* \* \*

Non-Parties SeniorSure Health Plans, Inc., Prime Health Group LLC, and PrimeHealth of Ohio, LLC (collectively “PrimeHealth”) hereby respectfully move this Court for an order permitting the admission *pro hac vice* in this Court of Attorney M. Carter Crow (Texas Attorney No. 05158500) of Norton Rose Fulbright US LLP, 1301 McKinney St., Suite 5100, Houston, TX 77010, telephone no. 713-651-5218, facsimile no. 713-651-5246, email carter.crow@nortonrosefulbright.com for the purposes of appearing as counsel on behalf of PrimeHealth with respect to its Motion to Intervene and Motion to Quash subpoenas served on certain PrimeHealth business partners (Doc #s 66-69) in the above-captioned matter. Movants, Matthew W. Nakon and Amy L. DeLuca are members of the Northern District of Ohio bar in good standing and have separately entered their appearances as co-counsel for PrimeHealth.

As set forth in Exhibit A, Affidavit of M. Carter Crow, attached hereto and incorporated herein by reference, Attorney Crow is admitted to the Texas bar and several federal district appellate courts, is in good standing with these courts and has never been sanctioned,

disciplined or reprimanded by any court, commission, bureau or agency. This Motion is made for the limited purpose of permitting Attorney M. Carter Crow to appear and participate in the Motion to Intervene and Motion to Quash by PrimeHealth only.

WHEREFORE, PrimeHealth respectfully requests that this Court admit Attorney M. Carter Crow to act as counsel for them in this matter and be admitted *pro hac vice* for the purposes of Prime Health's Motion to Intervene and Motion to Quash.

Respectfully submitted,

/s/Matthew W. Nakon

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M. Carter Crow (pending admission *pro hac vice*)

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ATTORNEYS FOR SENIORSURE HEALTH PLANS,  
INC., PRIME HEALTH GROUP, LLC, AND  
PRIMEHEALTH OF OHIO, LLC

**PROOF OF SERVICE**

This is to certify that a copy of the foregoing Motion for Admission *Pro Hac Vice* of Attorney M. Carter Crow has been sent via the Court's electronic filing system, on this 9<sup>TH</sup> day of February, 2017, to:

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/s/ Matthew W. Nakon

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Amy L. DeLuca